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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, NORTHERN DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT Box”), a Wyoming corporation; JASON R. ANDERSON, an individual; JACOB S. ANDERSON, an individual; SCHAD E. BRANNON, an individual; ROYDON B. NELSON, an individual; JAMES E. FRANKLIN, an individual; WESTERN OIL EXPLORATION COMPANY, INC., a Nevada corporation; RYAN BOWEN, an individual; IX GLOBAL, LLC, a Utah limited liability company; JOSEPH A. MARTINEZ, an individual; BENJAMIN F. DANIELS, an individual; MARK W. SCHULER, an individual; B & B INVESTMENT GROUP, LLC (d/b/a “CORE 1 CRYPTO”), a Utah limited liability company; TRAVIS A. FLAHERTY, an individual; ALTON O. PARKER, an individual; BW HOLDINGS, LLC (d/b/a the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J.

Case No.: 2:23-cv-00482-RJS

**PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION’S  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
ITS RESPONSE TO THE COURT’S  
NOVEMBER 30, 2023 ORDER TO  
SHOW CAUSE**

Chief Judge Robert J. Shelby  
Magistrate Judge Dustin B. Pead

STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRTZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to Federal Rule of Civil Procedure 6(b) and DUCivR 7-1(a)(2)(A), the Securities and Exchange Commission (“Commission”), through undersigned counsel, respectfully requests a seven-day extension of time, from December 14, 2023 to December 21, 2023, to file its written response to the Court’s November 30, 2023 Order to Show Cause as to why the Court should not impose sanctions (Doc. 215) (“Order to Show Cause”). Undersigned counsel conferred with counsel for Defendants, who stated either that they consent to or do not oppose the requested extension.

The Commission takes very seriously the concerns expressed by the Court in the Order to Show Cause and has undertaken a process to provide the Court with a thorough response to the Court’s questions. As part of that process, a new team of attorneys, including attorneys from the

Commission's Office of the General Counsel ("OGC"), has been assigned to review the events that gave rise to the Court's concerns and prepare the response to the Order to Show Cause. To allow the new team sufficient time to review the facts and prepare the response to the Court, the Commission is seeking a brief, seven-day extension of time to submit its response. Such an extension will not unduly delay the proceeding. Other than a joint status report due on January 3, 2024, and a status conference set for January 17, 2024, there are no upcoming court-ordered deadlines, and Defendants' motions to dismiss are fully briefed.

WHEREFORE, the Commission respectfully requests an extension of time to respond to the Order to Show Cause from December 14, 2023 to December 21, 2023.

Dated: December 7, 2023

Respectfully submitted,

/s/ Michael S. Bailey

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of December, 2023, I caused the foregoing to be served to all parties entitled to service through the Court's ECF system.

/s/ Michael S. Bailey  
Michael S. Bailey

*Attorney for Plaintiff Securities and Exchange  
Commission*